

Title: Heirs of Pio Tejada and Soledad Tejada vs. Garry B. Hay, Represented by Attorney-in-Fact Gomercindo Litong

Facts:

1. Myrna L. Hay initiated a Complaint for Quieting of Title against the heirs of Pio and Soledad Tejada regarding a parcel of land purportedly sold by the petitioners' father to Haru Gen Beach Resort and Hotel Corporation in 1988.
2. The property was later claimed to be sold to Myrna by Haru Gen in 1992, and by another deed allegedly showing Pio selling the property directly to Myrna in 1997.
3. The petitioners filed an Answer in August 2016, arguing that the deeds of sale were falsified and their father's signature was forged, seeking dismissal of the complaint.
4. Pre-trial was set but postponed multiple times, finally commencing in June 2017, with trial slated for October 2017.
5. Instead of proceeding, the trial was further delayed, and the case was referred for mediation on June 27, 2018.
6. On July 6, 2018, the petitioners filed a Motion for Leave to Admit an Amended Answer, intending to clarify and specify claims, assert counterclaims, and nullify the opposing deeds. The amended answer was alleged not to be dilatory.
7. The RTC denied the motion on August 17, 2018, claiming the case had already proceeded beyond pre-trial. Petitioners' counsels were ordered to justify why they should not face contempt for misrepresenting the case status.
8. Petitioners' Motion for Reconsideration was also denied on December 3, 2018.
9. On grounds of grave abuse of discretion, petitioners filed a Petition for Certiorari with the CA, which dismissed it on August 7, 2019. The CA upheld that the amendments were neither necessary nor was there any grave abuse of discretion by the RTC.
10. Petitioners' motion for reconsideration was rejected on November 20, 2019. Consequently, they filed a Petition for Review on Certiorari with the Supreme Court.

Issues:

1. Whether amendments to pleadings should be liberally allowed at any stage of proceedings.
2. Whether the RTC and CA's refusal of the Amended Answer constituted grave abuse of discretion.
3. Whether the amendments were interposed to cause delay.

Court's Decision:

1. The Supreme Court reversed the CA decision, emphasizing that amendments to pleadings

are generally favored to achieve a complete resolution on actual merits.

2. The Court found the RTC abused its discretion by focusing solely on the pre-trial completion, without examining the dilatory intent behind the amendments.

3. The Supreme Court underscored that procedural rules should aid and not frustrate justice. It found that the Amended Answer clearly specified particulars and included counterclaims essential for addressing the case's core issues, promoting an expeditious and just resolution.

Doctrine:

The case reiterates the principle that amendments to pleadings are to be liberally granted to facilitate a just resolution, provided they don't appear dilatory. Judicial discretion in allowing amendments should consider whether they aid in resolving the controversy on real facts without causing undue delay.

Class Notes:

- Procedural Rule: Sections 1, 3, Rule 10 of the Rules of Court; liberal allowance for amendment of pleadings unless intent to delay is apparent.
- Key Concept: Concepts of due process, liberality vs. technicality in procedural law, ensuring cases are resolved on substantial justice rather than procedural technicalities.
- Citation: "Amendments to pleadings are favored to ensure that justice is attained, and they are liberally allowed especially when filed at an early stage of litigation."

Historical Background:

This case exemplifies the tension between procedural technicality and the substantive merits of a case, reflecting enduring legal struggles to ensure defendants can fully articulate defenses while balancing against potential dilatory tactics. The decision serves as a contemporary affirmation of long-standing jurisprudence prioritizing substantive justice within procedural frameworks.